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15
16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF NEVADA**

18 CLARK COUNTY,)
19)
20 Plaintiff,)

Case No: 2:19-cv-01616-KJD-VCF

21 v.)

22 PURDUE PHARMA, L.P.; PURDUE)
PHARMA, INC.; THE PURDUE)
23 FREDERICK COMPANY, INC. d/b/a THE)
24 PURDUE FREDERICK COMPANY, INC.;)
PURDUE PHARMACEUTICALS, L.P.;)
25 RICHARD S. SACKLER; JONATHAN D.)
26 SACKLER; MORTIMER D.A. SACKLER;)
KATHE A. SACKLER; ILENE SACKLER)
27 LEFCOURT; DAVID A. SACKLER;)
BEVERLY SACKLER; THERESA)
28 SACKLER; PLP ASSOCIATES HOLDINGS)
L.P.; ROSEBAY MEDICAL COMPANY)

**STIPULATION AND ORDER TO STAY
DISCOVERY PENDING RESOLUTION
OF PLAINTIFF'S MOTION TO
REMAND**

(First Request)

1	L.P.; BEACON COMPANY; TEVA)
	PHARMACEUTICALS USA, INC.;)
2	CEPHALON, INC.; ENDO HEALTH)
	SOLUTIONS INC.; ENDO)
3	PHARMACEUTICALS, INC.; PAR)
4	PHARMACEUTICAL, INC.; PAR)
	PHARMACEUTICAL COMPANIES, INC.;)
5	ALLERGAN INC.; ALLERGAN USA INC.;)
	ACTAVIS, INC. f/k/a WATSON)
6	PHARMACEUTICALS, INC.; WATSON)
7	LABORATORIES, INC.; INSYS)
	THERAPEUTICS, INC.; JOHN KAPOOR;)
8	RICHARD M. SIMON; SUNRISE LEE;)
	JOSEPH A. ROWAN; MICHAEL J. GURRY;)
9	MICHAEL BABICH; ALEC BURLAKOFF;)
10	MALLINCKRODT LLC; SPECGX LLC;)
	ACTAVIS LLC; AND ACTAVIS PHARMA,)
11	INC. f/k/a WATSON PHARMA, INC.;)
12	AMERISOURCEBERGEN DRUG)
	CORPORATION; CARDINAL HEALTH,)
13	INC.; CARDINAL HEALTH 6 INC.;)
14	CARDINAL HEALTH TECHNOLOGIES)
	LLC; CARDINAL HEALTH 414 LLC;)
15	CARDINAL HEALTH 200 LLC;)
	MCKESSON CORPORATION;)
16	WALGREENS BOOTS ALLIANCE, INC.;)
	WALGREEN CO.; WALGREEN EASTERN)
17	CO., INC.; WALMART INC.; CVS HEALTH)
	CORPORATION; CVS PHARMACY, INC.;)
18	CVS INDIANA L.L.C.; CVS RX SERVICES,)
19	INC.; CVS TENNESSEE DISTRIBUTION,)
	L.L.C.; MASTERS PHARMACEUTICAL,)
20	LLC f/k/a MASTERS PHARMACEUTICAL,)
21	INC.; C & R PHARMACY d/b/a KEN'S)
	PHARMACY f/k/a LAM'S PHARMACY,)
22	INC.; EXPRESS SCRIPTS HOLDING)
	COMPANY; EXPRESS SCRIPTS, INC.;)
23	AIDA B MAXSAM; STEVEN A HOLPER)
24	MD; STEVEN A. HOLPER, M.D.,)
	PROFESSIONAL CORPORATION;)
25	HOLPER OUT-PATIENTS MEDICAL)
	CENTER, LTD.; DOES 1 through 100; ROE)
26	CORPORATIONS 1 through 100 and ZOE)
27	PHARMACIES 1 through 100, inclusive,)
)
28	Defendants.)

1 Pursuant to LR IA 6-1 and 6-2, and pursuant to LR 7-1, Defendant Aida Maxsam,
2 ("Defendants") and Plaintiff Clark County ("Plaintiff")¹, by and through their respective
3 undersigned counsel, hereby stipulate and agree, and respectfully request that the Court stay the
4 filing of a Discovery Plan and Scheduling Order required by Fed. R. Civ. P. 26(f) and LR 26-l(d),
5 and the conducting of all discovery in this action, pending this Court's resolution of Plaintiff's
6 Motion to Remand Pursuant to Rules 28 U.S.C. § 1447(c) (the "Motion to Remand") (Dkt. No.
7 7). This is the Parties' first request to stay the filing of a Discovery Plan and Scheduling Order
8 required by Fed. R. Civ. P. 26(f) and LR 26-l(d), and the conducting of all discovery, in this
9 action.

10 On September 27, 2018, counsel for Defendant and Plaintiffs conducted a discovery
11 teleconference pursuant to Fed. R. Civ. P. 26(f) and LR 26-l(d). During this conference, counsel
12 respectfully agreed that a stay of all further discovery obligations under Fed. R. Civ. P. 26(f) and
13 LR 26-l(d) is warranted pending the outcome of the Motion to Remand, and that said stay will
14 preserve valuable judicial resources, party resources, and time pending resolution thereof.

15 If the Court denies the Motion to Remand, in whole or in part, the Parties agree to submit
16 a Discovery Plan and Scheduling Order within thirty (30) days after entry of the Court's order on
17 the Motion to Remand.

18 As no other recently added Defendants have filed Answers in this action, no other parties
19 are affected by this Stipulation and Order.

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¹ Defendant and Plaintiffs are hereinafter jointly referred to as the "Parties."

1 For the foregoing reasons, the Parties respectfully suggest that good cause exists to grant
2 the Parties' stipulated stay of discovery. The undersigned represent this stipulation is not intended
3 for purposes of delay. If the Court deems it useful, the Parties are prepared to conduct a hearing
4 on this stipulated request pursuant to LR 78-1.

5
6 Dated this 2nd day of October, 2019.

Dated this 2nd day of October, 2019.

7 **EGLT ADAMS**

ASHCRAFT & BARR | LLP

8
9 /s/ Robert M. Adams, Esq.

/s/ Jeffrey F. Barr, Esq.

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18 -and-

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21 District Attorney

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24 *Counsel for Plaintiff Clark County*

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26 **IT IS SO ORDERED.**

27 10-2-2019

28 DATED: _____



UNITED STATES MAGISTRATE JUDGE

IT IS HEREBY ORDERED that a status conference is
scheduled for 10:00 AM, February 3, 2020, in
Courtroom 3D.